

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA**

**ELIZABETH SINES et al.** : **Case No. 3:17-cv-00072**

Plaintiff : **Judge MOON**

:

-v-

**JASON KESSLER et al.** :

:

Defendants

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**DECLARATION OF MATTHEW HEIMBACH**

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Mr. Matthew Heimbach, having been duly cautioned, declares and states as follows:

1. This declaration is based on personal knowledge.
2. I have been advised by my attorney that third party ESI vendors cost upwards of \$5,000 per device.
3. I cannot afford to pay for third party ESI vendor examinations of any electronic devices.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 24, 2018.

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Matthew Heimbach

**Signature:** Matt Heimbach  
Matt Heimbach (Oct 26, 2018)

Email: REDACTED